



# Storm Water Pollution Prevention Plans (SWP<sub>3</sub>)

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# SWPPP – What is it and why have one?



- SWPPP (Storm Water Pollution Prevention Plan) may be required by either an individual permit or the Multi-Sector General Permit.
- The SWPPP is a guidance for the facility to help the facility control the pollutants in storm water coming from the site.
- If a facility is required to develop & implement a SWPPP but fails to do so, they can be cited as being in violation of their permit.

# Storm Water Pollution Prevention Plan Requirements



- The preparation of a storm water pollution prevention plan (SWPPP) is required for the facility before submittal of the NOI for permit coverage.
- Copies of the plan should not be submitted to this Office unless specifically requested by the LDEQ.
- The SWPPP is intended to document the selection, design, and installation of control measures.
- The SWPPP must be prepared in accordance with good engineering practices. Use of a registered professional engineer for the SWPPP preparation is not required by the permit, but may be independently required under local ordinance.

# Storm Water Pollution Prevention Team



- The SWPPP must identify the name or title and individual responsibilities of each of the facility's storm water pollution prevention team staff member(s).
- This team is responsible for assisting the facility manager in developing and revising the SWPPP, maintaining control measure and taking corrective actions where required. Each team member must have ready access to either an electronic or paper copy of the applicable portions of this permit and the SWPPP.



# Site Description



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# Site Map

- The size of the property in acres.
- The location and extent of significant structures and impervious surfaces.
- Directions of storm water flow (use arrows).
- Locations of all existing structural control measures.
- Locations of all receiving waters in the immediate vicinity of the facility, indicating if any of the waters are impaired and, if so, whether the waters have TMDLs established for them.
- Locations of all storm water conveyances including ditches, pipes, and swales.
- Locations of potential pollutant sources.
- Locations of all storm water monitoring points.
- Locations of storm water inlets and outfalls, with a unique identification code for each outfall.

# Site Description (other requirements)

- Multiple Separate Storm Sewer Systems , where the facility's storm water discharges to the MS4
- Locations and descriptions of all non-storm water discharges
- Locations of the following activities where such activities are exposed to precipitation:
  1. Fueling stations
  2. Vehicle and equipment maintenance
  3. Loading/unloading areas
  4. Locations for treatment, storage, or disposal of wastes
  5. Liquid storage tanks
  6. Processing and storage areas
  7. Locations and sources of run-on to the site from adjacent property that contains pollutants



# Summary of Pollutant Sources

- The SWPPP must document areas at the facility where industrial materials or activities are exposed to storm water and from which allowable non-storm water discharges are released.
- *Industrial materials or activities* include, but are not limited to: material handling equipment or activities, industrial machinery, raw materials, industrial production and processes; and intermediate products, byproducts, final products, and waste products.
- *Material handling activities* include, but are not limited to: the storage, loading and unloading, transportation, disposal, or conveyance of any raw material, intermediate product, final product or waste product.



# Summary of Pollutant Sources (cont.)

- For each area identified, the description must include:
  1. *Activities in Area.* A list of the industrial activities exposed to storm water (e.g., material storage; equipment fueling, maintenance, and cleaning; cutting steel beams).
  2. *Pollutants.* A list of the pollutant(s) or pollutant constituents (e.g., crankcase oil, zinc, sulfuric acid, cleaning solvents, etc.) associated with each identified activity. The pollutant list must include all significant materials that have been handled, treated, stored or disposed, and that have been exposed to storm water in the 3 years prior to the date the SWPPP is prepared or amended.
  3. *Spills and Leaks.* The SWPPP must document where potential spills and leaks could occur that could contribute pollutants to storm water discharges, and the corresponding outfall(s) that would be affected by such spills and leaks.

# Non-Storm Water Discharges

- The SWPPP must document that the presence of non-storm water discharges has been evaluated and all unauthorized discharges have been eliminated. Documentation of the evaluation must include:
  1. The date of any evaluation
  2. A description of the evaluation criteria used
  3. A list of the outfalls or onsite drainage points that were directly observed during the evaluation
  4. The different types of non-storm water discharge(s) and source locations
  5. The action(s) taken, such as a list of control measures used to eliminate unauthorized discharge(s), if any were identified. For example, a floor drain was sealed, a sink drain was re-routed to sanitary, or an LPDES permit application was submitted for an unauthorized cooling water discharge.

# Description and Design of Control Measures



- The following must be considered when selecting and designing control measures:
  1. preventing storm water from contacting with polluting materials is generally more effective, and less costly, than trying to remove pollutants from storm water
  2. the use of control measures in combination rather than in isolation is more effective for minimizing pollutants in storm water discharges
  3. assessing the type and quantity of pollutants, including their potential to impact receiving water quality, is critical to designing effective control measures that will achieve the limits in this permit
  4. minimizing impervious areas at the facility and infiltrating runoff onsite

# Control Measures

- When selecting and designing control measures, the following must be considered:
  1. Preventing storm water from contacting polluting materials
  2. Use control measures in combination vs. isolation
  3. Assess the type and quantity of pollutants
  4. Minimize impervious areas at the facility
  5. Conserve and/or restore riparian buffers

# SWP<sub>3</sub> Documentation (pertaining to control measures)



- The following must be documented in the SWP<sub>3</sub>:
  1. Good housekeeping
  2. Maintenance
  3. Spill prevention and response procedures
  4. Employee training

# SWP<sub>3</sub> Documentation (pertaining to monitoring and inspection)



- For each type of monitoring, the SWP<sub>3</sub> must document:
  1. Locations where samples are collected
  2. Sampling parameters and frequency of sampling
  3. Schedules for monitoring at the facility
  4. Any numeric values applicable to discharges (benchmarks, TMDL-related, etc.)
  5. Procedures for gathering storm event data (responsible staff, lab to use, etc.)
  6. Persons conducting inspections, schedules for conducting inspections, & specific items to be covered by inspection (documentation for inspections)



# Allowable Non-Storm Water Discharges



- Except for flows from fire-fighting activities, the SWPPP shall identify each allowable non-storm water discharge, the source, location, and description of appropriate BMPs.



# Endangered Species & Historic Places

- Documentation supporting the permittee's determination for both of these must be kept with the SWP<sub>3</sub>.





# Applicable State or Local Plans

- The SWPPP shall be consistent (and updated as necessary to remain consistent) with applicable State and/or local storm water, waste disposal, and sanitary sewer or septic system regulations to the extent these apply to the facility and are more stringent than the requirements of this permit.



# SWPPP Availability

- The permittee must retain a copy of the current SWPPP required by this permit at the facility, and it must be made immediately available to the LDEQ or a local agency that approves storm water management plans, the operator of an MS4 receiving discharges from the site; and representatives of the U.S. Fish and Wildlife Service (USFWS) or the National Marine Fisheries Service (NMFS) at the time of an onsite inspection or upon request.
- The LDEQ encourages the permittee to post the facility's SWPPP online and provide the website address on the NOI.

# SWP<sub>3</sub> Modifications

- Whenever any of the following conditions occur, the permittee must take corrective action:
  1. an unauthorized release or discharge (e.g., spill, leak, or discharge of non-storm water not authorized by this or another LPDES permit) occurs at the facility
  2. the permittee becomes aware or the LDEQ determines that the control measures are not stringent enough for the discharge to meet applicable water quality standards
  3. there is any exceedance of an effluent limitation
  4. a LDEQ inspection or evaluation indicates that modifications to the control measures are necessary to meet the non-numeric effluent limits in this permit
  5. routine facility inspections, quarterly visual assessments, or comprehensive site inspections indicate that control measures are not being properly operated and maintained

# Correction Action Deadlines

- Discovery of any conditions that require SWP<sub>3</sub> modification must be documented within 24 hours of making such discovery. Subsequently, within 14 days of such discovery, the permittee must document any corrective action(s) to be taken to eliminate or further investigate the deficiency, or if no corrective action is needed, the basis for that determination.





# Corrective Action Report

- Within 24 hours of discovery of any condition that would cause a modification to the SWP<sub>3</sub>, the permittee must document the following information:
  1. Identification of the condition triggering the need for corrective action review
  2. Description of the problem identified
  3. Date the problem was identified

# Corrective Action Report (cont.)

- Within 14 days of discovery of any condition that causes a modification to be made, the permittee must document the following information:
  1. Summary of corrective action taken or to be taken (or, for triggering events identified in Part 4.6
  2. where the permittee determines that corrective action is not necessary, the basis for this determination
  3. Notice of whether SWPPP modifications are required as a result of this discovery or corrective action
  4. Date corrective action initiated; and
  5. Date corrective action completed or expected to be completed.
- Note that the permittee must retain a copy of the documentation onsite with the SWPPP for a 3-year period following permit expiration or termination.





02/24/2017





05/16/2014





05/24/2016





05/24/2016





# Resources

EPA website (epa.gov)

- <https://www.epa.gov/npdes/developing-stormwater-pollution-prevention-plan-swppp>

LDEQ website

- <https://deq.louisiana.gov/page/storm-water-protection>

LDEQ SBSCAP

- <https://deq.louisiana.gov/page/small-business-parish-assignments-regional-contacts>



# Contact Information



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